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Attorneys for Movant, the ATD Group

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES O. PRINCE,  
ROBERT E. RUBIN, STEPHEN R. VOLK, SALLIE  
L. KRAWCHECK, GARY L. CRITTENDEN and  
ROBERT DRUSKIN,

Defendants.

Civil Action No.  
07 CIV 9901 (SHS)

LENNARD HAMMERSCHLAG, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE, SALLIE  
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No. 07 CIV 10258 (SHS)

**AFFIDAVIT OF IRA M. PRESS IN SUPPORT OF THE MOTION  
OF THE ATD GROUP FOR APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF MOVANT'S SELECTION OF LEAD COUNSEL**

STATE OF NEW YORK                    )  
COUNTY OF NEW YORK                ) ss.:

IRA M. PRESS, being duly sworn, deposes and says:

1. I am a member of the law firm of Kirby McInerney LLP, counsel for movants Edward and Elaine Altman, Jonathan Butler, M. David Diamond, and David and Henrietta Whitcomb (collectively the “ATD Group” or “Movant”).

2. I make this affidavit in support of motion for an order appointing the ADT Group as Lead Plaintiff in the above-captioned actions pursuant to Section 21D of the Securities Exchange Act of 1934 and approving the ADT Group’s selection of counsel for the proposed class.

3. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: Press release disseminated over Business Wire on November 8, 2007 announcing the pendency of the above-captioned *Saltzman* lawsuit commenced as a putative class action on behalf of investors of Citigroup during the period April 17, 2006 through November 2, 2007.

Exhibit B: Press Release disseminated over the Prime Newswire Service on November 9, 2007, announcing the pendency of the above-captioned *Hammerschlag* lawsuit as a putative class action on behalf of purchasers of Citigroup, Inc. securities during the

period January 1, 2004 through November 5, 2007.

Exhibit C: Sworn certifications of the ATD Group members.

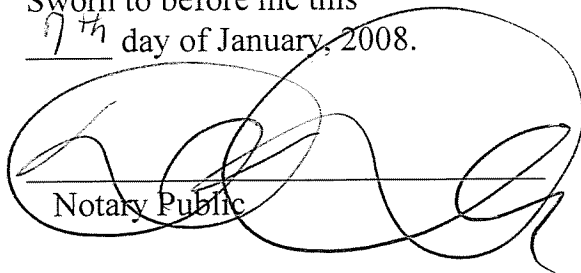
Exhibit D: Tables calculating losses incurred by the ATD Group members as a result of their class period acquisition of Citigroup, Inc. securities.

Exhibit E: Declaration of ATD Group member David Whitcomb, describing (a) the pre-litigation relationship of the Group members; and (b) the manner in which the ATD Group members acquired Citigroup stock.

Exhibit F: Firm resume of Kirby McInerney LLP (proposed lead counsel).

  
\_\_\_\_\_  
IRA M. PRESS

Sworn to before me this  
7<sup>th</sup> day of January, 2008.

  
\_\_\_\_\_  
Notary Public

**NORMA ROPER**  
Notary Public, State of New York  
No. 01RO6116250  
Qualified in Kings County  
Commission Expires September 20, 2008